

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

Christian Casey LLC d/b/a Sean John, et al.

08 CIV 00870 (GBD)

Plaintiffs,

**MOTION TO ADMIT COUNSEL  
PRO HAC VICE**

-against-

A & E Stores, Inc., et al.

Defendants.

PURSUANT TO RULE 1.3(c) of the Local Rules of the United States District Courts for the Southern and Eastern Districts of New York, I, **ROBERT L. TUCKER**, a member in good standing of the bar of this Court, hereby move for an Order allowing the admission pro hac vice of:


Applicant's Name: **Brent H. Blakely**  
Firm Name: Blakely Law Group  
Address: 915 North Citrus Avenue  
City/State/Zip: Hollywood, California, 90038  
Phone Number: (323) 464-7400  
Fax Number: (323) 464-7410

BRENT H. BLAKELY is a member in good standing of the Bar of the State of CALIFORNIA.

There are no pending disciplinary proceedings against Mr. Blakely in any State or Federal court.

Dated: February 11, 2008  
City, State: New York, New York

Respectfully Submitted,



Robert L. Tucker (RLT 1027)  
Tucker & Latifi LLP  
60 East 84th Street  
New York, NY 10028  
Tel: (212) 472-6200  
Fax: (212) 744-6509

FEB 27 2008

925-643196

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

Christian Casey LLC d/b/a Sean John, et al.

08 CV 00870 (GBD)

Plaintiffs,

-against-

**AFFIDAVIT OF ROBERT L. TUCKER IN  
SUPPORT OF MOTION TO ADMIT  
COUNSEL PRO HAC VICE**

A & E Stores, Inc., et al.

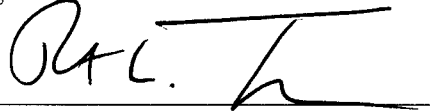
Defendants.

ROBERT L. TUCKER, being duly sworn, hereby deposes and says as follows:

1. I am the senior partner at TUCKER & LATIFI LLP, counsel for Plaintiffs in the above captioned action. I am familiar with the proceedings in this case. I make this statement based on my personal knowledge of the facts set forth herein and in support of Plaintiffs' Motion to admit BRENT H. BLAKELY as counsel pro hac vice to represent Plaintiffs in this matter.
2. I am a member in good standing of the bar of the State of New York, and was admitted to practice law in July 1984. I am also admitted to the bar of the United States District Court for the Southern District of New York, and am in good standing with this Court.
3. I have known Brent H. Blakely since 1999.
4. Mr. Blakely is of counsel to TUCKER & LATIFI, LLP in our Hollywood, California office.
5. I have found Mr. Blakely to be a skilled attorney and a person of integrity. He is experienced in Federal practice and is familiar with the Federal Rules of Civil Procedure.
6. Accordingly, I am pleased to move the admission of Brent H. Blakely, pro hac vice.
7. I respectfully submit a proposed order granting the admission of Brent H. Blakely, pro hac vice, which is attached hereto as Exhibit A.

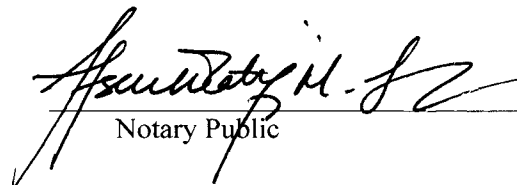
**WHEREFORE** it is respectfully requested that the motion to admit BRENT H. BLAKELY, pro hac vice, to represent Plaintiffs in the above captioned matter, be granted.

Dated: February 11, 2008  
New York, New York

  
Robert L. Tucker

State of New York        }  
                                  Ss:  
County of New York     }

Subscribed and sworn to before me this 11<sup>th</sup> day of February, 2008.

  
Notary Public

**AFSOHINEH LATIFI M. TEHRANI**  
Notary Public, State of New York  
No. 02LA5029015  
Qualified in New York County  
Commission Expires 2/28/2010

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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Christian Casey LLC d/b/a Sean John, et al.

08 CIV 00870 (GBD)

Plaintiffs,

**[PROPOSED] ORDER FOR ADMISSION PRO  
HAC VICE ON WRITTEN MOTION**

-against-

A & E Stores, Inc., et al.

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Defendants.

Upon the Motion of ROBERT L. TUCKER, attorney for Plaintiffs Christian Casey LLC d/b/a Sean John and Studio IP Holdings, LLC d/b/a Rocawear, and said sponsor's affidavit in support;

**IT IS HEREBY ORDERED** that:

**Brent H. Blakely**  
Blakely Law Group  
915 North Citrus Avenue  
Hollywood, California, 90038  
Tel: (323) 464-7400  
Fax: (323) 464-7410  
E-mail: [BrentBlakely@earthlink.net](mailto:BrentBlakely@earthlink.net)

is admitted to practice pro hac vice as counsel for Plaintiffs Christian Casey LLC d/b/a Sean John and Studio IP Holdings, LLC d/b/a Rocawear in the above captioned case in the United States District Court for the Southern District of New York. All attorneys appearing before this Court are subject to the Local Rules of this Court, including the Rules governing discipline of attorneys. If this case is assigned to the Electronic Case Filing (ECF) system, counsel shall immediately apply for an ECF password at [nysd.uscourts.gov](http://nysd.uscourts.gov). Counsel shall forward the pro hac vice fee to the Clerk of Court.

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HON. GEORGE B. DANIELS  
United States District Judge



# THE STATE BAR OF CALIFORNIA

MEMBER SERVICES CENTER

180 HOWARD STREET, SAN FRANCISCO, CALIFORNIA 94105-1639

TELEPHONE: 888-800-3400

February 5, 2008

TO WHOM IT MAY CONCERN:

This is to certify that according to the records of the State Bar, BRENT HERBERT BLAKELY, #157292 was admitted to the practice of law in this state by the Supreme Court of California on December 16, 1991; and has been since that date, and is at date hereof, an ACTIVE member of the State Bar of California; and that no recommendation for discipline for professional or other misconduct has ever been made by the Board of Governors or a Disciplinary Board to the Supreme Court of the State of California.

THE STATE BAR OF CALIFORNIA

A handwritten signature in cursive script, appearing to read "Kath Lambert", is written over the printed name.

Kath Lambert  
Custodian of Membership Records

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

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Christian Casey LLC dba Sean John, et al. 08 cv 00870 (GBD)

Plaintiffs,

**AFFIRMATION OF SERVICE**

-against-

A & E Stores, Inc., et al.

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Defendants.

I, Ali Latifi, declare under penalty of perjury that I have served copies of the attached *Motion for Admission of Pro Hac Vice, Affidavit of Robert L. Tucker in support thereof, and Proposed Order for Admission of Pro Hac Vice* upon the following parties by **First**

**Class Mail** as follows:

Kenneth R. Schachter, Esq.  
Silverberg Stonehill Goldsmith & Haber  
111 West 40th Street – 33rd Floor  
New York, New York 10018  
***Attorneys for Defendant A & E Stores***

Dennis McCoee  
Blank Rome LLP  
One Logan Square  
130 North 18th Street  
Philadelphia, Pennsylvania 19103-6998  
***Attorneys for Defendant Forman Mills, Inc.***

Albert Srour  
774 Broadway  
Brooklyn, New York 11206  
***Defendant Albert Srour***

Fat Albert's Warehouse, Inc.  
774 Broadway  
Brooklyn, New York 11206  
***Defendant Fat Albert's Warehouse, Inc.***

DATED: February 27, 2008  
New York, New York

  
\_\_\_\_\_  
160 East 84th Street, Suite 5E  
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(212) 472-6262